

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Telecommunications Relay Services and) **CG Docket No. 03-123**
Speech to-Speech Services for Individuals)
with Hearing and Speech Disabilities)

To: Chief, Consumer and Governmental Affairs Bureau
Internet-based TRS Certification Program

AMENDMENT TO
INTERNET-BASED TRS RECERTIFICATION APPLICATION
PURPLE COMMUNICATIONS, INC.

Purple Communications, Inc., (referred to herein as “Purple” and the “Company”) submits this amendment to its October 4, 2011 application¹ for recertification demonstrating Purple is eligible to receive reimbursement from the Interstate Telecommunications Relay Services (“TRS”) Fund as a provider of Internet Protocol Captioning Telephone Service (IP-CTS). All applicable statements in Purple’s application for recertification, as supplemented, continue to apply. The Company amends its application with the following:

1. Full certification for all forms of relay service

Purple requests that full certifications as a VRS and an IP Relay provider be granted to Purple concurrent with the Company’s renewal of certification as an IP-CTS provider for a new term of five years.

2. IP-CTS and description

On November 14, 2008, the FCC granted Purple certification as a provider of IP-CTS eligible for compensation from the TRS Fund. This certification is in effect for a period of five years, expiring November 13, 2013. Purple hereby requests that its certification for IP-CTS be renewed for an additional five years.

IP-CTS is a telecommunications relay service that permits an individual who can speak but who has difficulty hearing over the telephone to use a telephone and an Internet Protocol-enabled device via the Internet to simultaneously listen to the other party and read captions of what the

¹ Applications and amendments filed on CG Docket 03-123, October 4, 2011, December 27, 2011 and December 30, 2011.

other party is saying. With IP-CTS, the connection carrying the captions between the relay service provider and the relay service user is via the Internet, rather than the public switched telephone network.

Purple offers IP-CTS under the ClearCaptions™ brand name.

3. VRS & IP Relay

On January 4, 2012, the FCC granted Purple conditional certification as a provider of VRS and IP Relay. Purple has continued to show that it is a provider in good standing and believes that full certification for VRS and IP Relay is timely and warranted.

Purple thus renews its request that full certification for five years be granted concurrently for all three of its Internet-based relay services.

4. Appendix attachments

Attached in the appendix are documents that furnish further information required for certification for IP-CTS.

A. Mandatory Minimum Standards

Attached in Appendix A is a description of how the Company will meet all non-waived mandatory minimum standards, ensure compliance with all applicable TRS rules, a description of its complaint procedures and a statement of continuing to file annual compliance reports.

B. Corporate Stakeholders, Structure and Officers

Attached in Appendix B is a description of Corporate Stakeholders, Structure and Officers.

C. List of the Number of Employees

Attached in Appendix C is a list of the number of applicant's full-time and part-time employees involved in IP-CTS operations.

D. Sponsorship Arrangements

Attached in Appendix D is a list of sponsorship arrangements that the Company has entered into for IP-CTS.

E. Certification

The Officer Certification is included at the end of this letter.

5. Conclusion

Purple plays a key role in the relay industry as a trusted provider of services to deaf consumers. Purple is one of two remaining providers that provide IP Relay services, and is the only remaining provider of IP Relay that offers AIM-based solutions. Purple is the second largest VRS provider and continues to bring new services to its consumers, including the recent launch of its innovative, home-based smart videophone solution, the SmartVP™. Purple is also an innovator of new technology for the provision of IP-CTS through both Ensemble and Cisco IP phones and is proud of its record in bringing telecommunication access to those individuals who have previously been unable to use the telephone effectively.

Purple will continue to meet or exceed all non-waived operational, technical and functional minimum standards contained in the rules, and will continue to ensure appropriate procedures and remedies for ensuring ongoing compliance with the Commission's rules.

Purple is a qualified VRS, IP Relay and IP-CTS provider. Purple therefore requests that the Commission grant it recertification of IP-CTS and full certification for VRS and IP Relay. Should the Bureau require any additional information, kindly contact the undersigned.

Respectfully submitted,
PURPLE COMMUNICATIONS, INC.

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AMENDMENT TO INTERNET-BASED TRS CERTIFICATION APPLICATION

PURPLE COMMUNICATIONS, INC

CERTIFICATION

I swear under penalty of perjury that I am John Ferron, President and CEO of Purple Communications, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

<u> /s/ </u>	<u> 8/13/13 </u>
John Ferron	Date